

Privacy Policy October 2021



ASSUREINVEST'S PRIVACY POLICY

INTRODUCTION

AssureInvest Pty Ltd ABN 55 636 036 188 AFS licence number 478978 ("AssureInvest") abides by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 as a matter of good practice, although as a small business operator it is not required to meet the obligations that apply under that Act.

This privacy policy explains how we collect, use, disclose, manage and otherwise protect your personal information. You should be aware we treat all information you provide us in confidence and will take all reasonable steps to ensure non-disclosure to anyone other than for the purpose of providing the services you have requested.

REASONS FOR COLLECTING INFORMATION

We will only collect, maintain and use personal information about individuals who are our customers or who represent corporate customers such as names, email addresses and phone numbers from those persons and if collecting that information is reasonably necessary or directly related to our functions and activities, including for us to adequately provide the services you have requested such as to:

- Guide you in selecting one of our services
- Provide the services you have subscribed to
- Administer those services, including to ensure customers are provided with information about changes and/or matters affecting the services we provide, invoicing and collecting fees and charges
- Conduct appropriate identity checks for the services provided to you
- Providing marketing information to you about other services provided by us or

- affiliated organisations that may be of interest to you
- maintaining our relationship with you
- complying with any legal or regulatory requirements (such as assessing if you are within a relevant target market)
- dealing with any complaints or enquiries.

CONSEQUENCES OF NOT PROVIDING INFORMATION

Failure to provide the personal information referred to above may result in us not being able to provide the services you have subscribed to.

If you elect not to provide us with the personal information referred to above, we may elect to withdraw our services if we believe we are unable to provide you with a complete service.

OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

We are committed to being open and transparent about how we use personal information.

We will not use your personal information for any purpose other than for which it was originally collected, unless you have given us your consent to do so, or unless it is required by law or reasonably expected that we will use the information for a related purpose (a secondary purpose).

Should we receive personal information that we have not asked for, we will as soon as practicable destroy the information.

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy.

If, at any time, you do not wish to receive marketing information, you may contact us with this request. We will endeavour to meet your request within two weeks. We maintain



a register for those individuals not wanting direct marketing material. Please refer to the end of this document for our contact details.

HOW WE COLLECT INFORMATION FROM YOU

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally, collection of your personal information will be effected in either a face to face situation, over the telephone or by way of email. From time to time additional and/ or updated personal information may be collected through one or more of these methods.

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

STORAGE OF PERSONAL INFORMATION

Your personal information is generally held in your client file. Information may also be held in a computer database. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential.

After-hours access to our premises is controlled by allowing only personnel with security passes to access the premises. All computer- based information is protected through the use of access passwords on each computer.

Data is backed up regularly and back ups may be stored off site. In the event you cease to be a client of this organisation, any personal information which we hold about you will be destroyed after an appropriate period of time that complies with legislative and professional requirements (usually 7-10 years).

Any personal information that we hold will be held within Australia except to the extent that it may be contained in back ups to our computer systems which may be held on servers outside Australia. It is not possible to identify which countries outside Australia might be involved.

ACCESS TO YOUR PERSONAL INFORMATION

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if we are not required to do so under the Australian Privacy Principles, for example if:

- providing access would have an unreasonable impact on the privacy of others:
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between us, and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;



- denying access is required o authorised by or under law;
- providing access would be likely to prejudice certain operations by, or on behalf of an enforcement body.
- giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

We will endeavour to respond to any request for access within 14 to 30 days depending on the complexity of the information and/ or the request. If your request is urgent please indicate this clearly. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

CORRECTION OF PERSONAL INFORMATION

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the problem and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

COMPLAINTS

If you wish to complain about any privacy issue, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within seven days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at http://www.oaic.gov.au/.

CONTACT DETAILS

Please contact us if you have any questions or concerns about how we manage personal information.

The Privacy Officer AssureInvest Pty Ltd PO Box 612 Neutral Bay NSW 2089 Australia

e info@assureinvest.com.au

